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10 CALIFORNIA SPORTFISHING

11 PROTECTION ALLIANCE

12 **UNITED STATES DISTRICT COURT**

13 **EASTERN DISTRICT OF CALIFORNIA**

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16 CALIFORNIA SPORTFISHING PROTECTION
ALLIANCE,

17 Plaintiff,

18 v.

19 PACIFIC BELL TELEPHONE COMPANY

20 Defendant.
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Case No.: 2:21-cv-00073-JDP

**SUPPLEMENTAL DECLARATION
OF JASON FLANDERS IN SUPPORT
OF PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES AND COSTS
UNDER THE RESOURCE
CONSERVATION AND RECOVERY
ACT (42 U.S.C. § 6972(e)) AND CODE
OF CIVIL PROCEDURE SECTION
1021.5**

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1 I, Jason Flanders, declare:

2 1. The facts set forth in this declaration are based on my personal knowledge; if called
3 to testify as a witness, I could and would competently testify thereto under oath. As to those matters
4 that reflect a personal opinion, they reflect my personal opinion and judgment upon the matter.

5 2. I am more than eighteen years old and am competent to testify as to the matters set
6 forth herein.

7 3. I am an attorney licensed to practice law in the State of California. I am a partner
8 with Aqua Terra Aeris Law Group, representing California Sportfishing Protection Alliance in the
9 above referenced action.

10 4. Since the Notice of Motion and Motion for Fees and Costs was filed, I have spent
11 13.3 hours working on this matter. My time has been spent preparing this declaration, outlining,
12 drafting and revising the Reply, and reviewing others' declaration to incorporate into the Reply. I
13 took lead on drafting the Reply and kept my hours to a minimum by working efficiently. In an
14 exercise of billing judgment, my hours were reduced by 1.3 hours, or a 10% reduction.

15

16 I declare, under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct. Executed on the 6th of December 2024 in Oakland, California.

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19 /S/ Jason Flanders
20 Jason Flanders

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